

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff,

Adv. Pro. No. 10-05124 (SMB)

Plaintiff,

v.

THE LAWRENCE J. RYAN AND THERESA R.  
RYAN REVOCABLE LIVING TRUST, THE  
LAWRENCE J. RYAN BY-PASS TRUST  
UNDER DECLARATION OF TRUST DATED,  
11/20/1991, and THERESA R. RYAN,  
individually and in her capacities as trustee of THE  
LAWRENCE J. RYAN AND THERESA R.  
RYAN REVOCABLE LIVING TRUST  
and THE LAWRENCE J. RYAN BY-PASS  
TRUST UNDER DECLARATION OF TRUST  
DATED 11/20/1991,

Defendants.

**[PROPOSED] ORDER STRIKING DEFENDANTS' ANSWER**

Upon consideration of the Trustee's Motion to Strike Defendants' Answer (the "Motion"), and the Court having considered all objections, declarations and other pleadings related to the Motion, and any arguments of the parties, the Court has determined that good and sufficient cause exists for granting the relief requested in the Motion. Therefore,

IT IS HEREBY ORDERED that the Motion is GRANTED.

IT IS HEREBY ORDERED that the Trustee may present an order striking Defendants' Answer and seeking entry of default judgment against Defendants.

IT IS HEREBY ORDERED this Court shall retain jurisdiction over the parties to this Adversary Proceeding for the purpose of, among other things, enforcing this Order.

Dated: New York, New York  
February \_\_, 2021

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE